

# Fw: Former City Scrap - Connector Road

Kenneth Bardo to: Peter Ramanauskas

08/22/2012 11:42 AM

Kenneth Bardo/R5/USEPA/US From:

To: Peter Ramanauskas/R5/USEPA/US@EPA,

History: This message has been replied to.

pete, if this works out., they will remove about 900 cubic yards before September 30.

----- Forwarded by Kenneth Bardo/R5/USEPA/US on 08/22/2012 11:45 AM -----

From: Kenneth Bardo/R5/USEPA/US

To: Paul Gallagher <pgallagher@sanbornhead.com>

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

08/22/2012 11:40 AM Date:

Re: FW: Former City Scrap - Connector Road Subject:

Paul, EPA has reviewed your letter of August 16th providing the Supplemental PCB Assessment and Soil Management and Disposal Plan for TSB Metals and Recycling, LLC located at 611 Wilbeth Road in Akron, Ohio. EPA provides the following comments:

Explain why borings B618 and B619 were not sampled and analyzed.

- Sheet No. 2 of 3. Exhibit A reports PCB levels at 0 to 1 feet at B616 at <11.5 ppm. Has this data been validated and accepted? This detection limit is too high to confirm that PCBs are not present above cleanup levels. Conduct additional sampling to confirm PCB levels at this location.
- In the summary report, provide final verification results showing that Areas B, C, and D have been adequately remediated (i.e., PCBs <1 ppm). Also provide the completed manifests for disposal of approximately 900 cubic yards of PCB contaminated soil at the American Landfill in Waynesburg, Ohio.
- Ensure that the cut and fill activities associated with the proposed connector road do not impinge within the proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507, B508, B608). Consider erecting the proposed relocated fence in this area before road construction activities to delineate the area not to be disturbed.

Paul Gallagher Hi Ken: For your review and approval, this mess... 08/16/2012 08:22:28 AM

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"Knott, Charles J." <charles.knott@timken.com>, "Oberster, Alan C." <alan.oberster@timken.com> Cc:

Date: 08/16/2012 08:22 AM

Subject: FW: Former City Scrap - Connector Road

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I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

# Thank you. We appreciate your help.

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Paul P. Gallagher, P.G., C.P. Project Director

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From: Paul Gallagher

**Sent:** Wednesday, July 11, 2012 12:15 PM

**To:** 'Kenneth Bardo' **Cc:** 'Oberster, Alan C.'

Subject: FW: Former City Scrap - Connector Road

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Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Friday, June 22, 2012 6:30 PM

**To:** Paul Gallagher **Cc:** Oberster, Alan C.

Subject: Re: Former City Scrap - Connector Road

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From: Paul Gallagher < pgallagher@sanbornhead.com >

To: Kenneth Bardo/R5/USEPA/US@EPA

Date: 06/21/2012 04:11 PM

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- 1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.
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It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

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Re: Fw: Former City Scrap - Connector Road

Peter Ramanauskas to: Kenneth Bardo

08/22/2012 04:57 PM

Peter Ramanauskas/R5/USEPA/US From: To: Kenneth Bardo/R5/USEPA/US,

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Re: Fw: Former City Scrap - Connector Road

Kenneth Bardo to: Peter Ramanauskas

08/23/2012 09:03 AM

From: Kenneth Bardo/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA,

History: This message has been replied to.

no, the new property owner (Timken) is doing the work prior to the city constructing the road. Timken will remove all soil >1 ppm PCBs within the construction area prior to the city performing the work. a new fence will be constructed and the deed restriction amended.

the remediation area currently targeted is 1/4 acre.

Peter Ramanauskas Thanks for the info, Ken. So it sounds like this... 08/22/2012 04:56:22 PM

From: Peter Ramanauskas/R5/USEPA/US
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Date: 08/22/2012 04:56 PM

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Re: Fw: Former City Scrap - Connector Road

Peter Ramanauskas to: Kenneth Bardo

08/23/2012 09:10 AM

From: Peter Ramanauskas/R5/USEPA/US
To: Kenneth Bardo/R5/USEPA/US,

OK thanks, Ken. Sounds like they are abiding by our previous approval. Pete

Kenneth Bardo no, the new property owner (Timken) is doing th... 08/23/2012 09:03:41 AM

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- 2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations of PCBs greater than 1 ppm, so they will need to be managed appropriately.

3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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the sender by replying to this message and then delete the message and any attachments.

[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US]



# Fw: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

Kenneth Bardo to: Peter Ramanauskas 10/09/2012 09:37 AM

From: Kenneth Bardo/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA,

hi, pete. this is getting more complicated and PCBs are found to be outside of the original fenceline as part of the deed restriction. could you give me your opinion on their proposal. thanks, ken

---- Forwarded by Kenneth Bardo/R5/USEPA/US on 10/09/2012 09:36 AM -----

From: Paul Gallagher <pgallagher@sanbornhead.com>

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Date: 10/05/2012 09:44 AM

Subject: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

# Hi Ken,

This message includes our proposed approach to complete the supplemental PCB cleanup at the TSB Metal Recycling (TSB) property in Akron, Ohio. The attached figure depicts the status of the supplemental PCB cleanup, which is being performed to support the pending construction of a road by the City of Akron. To date, TSB has excavated and disposed of approximately 1,500 tons of soil, and the latest verification results suggest that the current approach to remove and dispose the residual PCB contaminated soils in the vicinity of the road is not viable.

The deed restriction for the original PCB cleanup by City Scrap and Salvage Co. (City Scrap) limits land use to industrial and commercial only, and requires that the property be secured by a fence. When City Scrap completed the original PCB cleanup, their perimeter fence secured the central and western portions of the property. The limited data obtained outside of the fenced area when the original PCB cleanup was completed indicated that PCB contamination did not extend beyond the fenced area.

Since the proposed road extends through the current fenced area, the supplemental PCB cleanup completed to date has focused on removing residual PCB contamination within the eastern-most portion of the fenced area. However, as shown on the attached figure, the recent analytical results indicate that the distribution of PCBs in soils extends beyond the current fenced area, into the eastern portion of the property. Based on our updated understanding of the distribution of residual PCB contamination at the property, it's no longer economically feasible to continue the current supplemental PCB cleanup approach.

We recommend for your consideration the following modified approach, which is based on the standard cleanup levels for a self-implementing PCB cleanup (40 CFR §761.61(a)(8)):

• Rather than constraining the supplemental PCB cleanup approach to manage soils based on the location of the existing fence area, the deed restriction will require: 1) a relocated fence to secure the metal recycling operations as described in the Soil Handling

and Management Plan dated August 2012, and 2) high occupancy use will be prohibited in the area to the east of the relocated fenced area, where the proposed driveway and road will be built. Prohibiting high-occupancy use is consistent with the requirements for a cleanup under the self-implementing cleanup rules.

- Based on the self-implementing cleanup requirements for bulk remediation waste with low occupancy use, the remaining active cleanup activities to the east of the relocated fence will focus on the removal and off-site disposal of soils with residual PCB concentrations greater than 25 ppm (i.e., in the vicinity of test pit "f"). Post-excavation sampling will be performed to verify the removal of residual PCB contamination at concentrations greater than 25 ppm.
- During construction of the road, the soils located outside of the relocated fenced area with residual PCB concentrations between 1 ppm and 25 ppm will be managed and reused within the low-occupancy area. Please note that the proposed road grade extends more than 13 feet below the current ground surface elevation, and soils with PCB concentrations greater than 1 ppm will not be used as fill within the right-of-way for the road.

We can provide additional details once you have had a chance to review the data and considered the above approach.

Thank you for your assistance, and please contact me if you have any comments or suggestions.

Regards,

Paul

--

Paul P. Gallagher, P.G., C.P. Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Thursday, September 13, 2012 5:34 PM

To: Paul Gallagher

**Subject:** Re: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

paul, thanks for the updated figure depicting the areas of excavation for the PCB cleanup at the TSB Metals site. EPA comments on the August 16 workplan have been addressed. the work may proceed. please provide a summary report when the work is complete, including verification sampling and manifests for wastes disposed at the two landfills. ken

Paul Gallagher ---09/10/2012 04:45:58 PM---Hi Ken: The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesd

From: Paul Gallagher < pgallagher@sanbornhead.com >

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>

Date: 09/10/2012 04:45 PM

Subject: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

#### Hi Ken:

The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesday. This message includes an updated soil excavation plan, which also summarizes the soil disposal program. Non-hazardous soil will be disposed of at Countywide Landfill, and hazardous waste soil (based on TCLP lead results for each excavation area) will be disposed of at Envirite of Ohio. In accordance with the *Supplemental PCB Assessment and Soil Management and Disposal Plan*, post-excavation sampling will be conducted at Areas B through E.

Please contact me if you have any questions or comments.

Paul

--

Paul P. Gallagher, P.G., C.P. Project Director

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**From:** Paul Gallagher

Sent: Wednesday, August 29, 2012 3:00 PM

To: 'Kenneth Bardo'

Cc: Oberster, Alan C.; 'Knott, Charles J.'

Subject:

#### Hi Ken:

Paul

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

- 1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.
  2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.
- 3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
- 4) Arrangements are being made to install the fence before the road construction activities begin.

Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday, we will begin the excavation activities once disposal arrangements are finalized.

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report.

Please contact me if you have any questions or comments. Thank you for your assistance.

Paul P. Gallagher, P.G., C.P.	
Project Director	

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 12:41 PM

**To:** Paul Gallagher

Cc: Oberster, Alan C.; Knott, Charles J.

Subject: Re: FW: Former City Scrap - Connector Road

Paul, EPA has reviewed your letter of August 16th providing the *Supplemental PCB Assessment and Soil Management and Disposal Plan* for TSB Metals and Recycling, LLC located at 611 Wilbeth Road in Akron, Ohio. EPA provides the following comments:

Explain why borings B618 and B619 were not sampled and analyzed.

- Sheet No. 2 of 3, Exhibit A reports PCB levels at 0 to 1 feet at B616 at <11.5 ppm. Has this data been validated and accepted? This detection limit is too high to confirm that PCBs are not present above cleanup levels. Conduct additional sampling to confirm PCB levels at this location.
- In the summary report, provide final verification results showing that Areas B, C, and D have been adequately remediated (i.e., PCBs <1 ppm). Also provide the completed manifests for disposal of approximately 900 cubic yards of PCB contaminated soil at the American Landfill in Waynesburg, Ohio
- Ensure that the cut and fill activities associated with the proposed connector road do not impinge
  within the proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507,
  B508, B608). Consider erecting the proposed relocated fence in this area before road
  construction activities to delineate the area not to be disturbed.

To: Kenneth Bardo/R5/USEPA/US@EPA

 $\label{eq:cc: white composition} \mbox{Cc: "Knott, Charles J."} < \mbox{$\frac{charles.knott@timken.com}{com}$>, "Oberster, Alan C."} < \mbox{$\frac{alan.oberster@timken.com}{com}$> $$$ 

Date: 08/16/2012 08:22 AM

Subject: FW: Former City Scrap - Connector Road

#### Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul

--

Paul P. Gallagher, P.G., C.P.

Project Director

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From: Paul Gallagher

www.sanbornhead.com

**Sent:** Wednesday, July 11, 2012 12:15 PM

**To:** 'Kenneth Bardo' **Cc:** 'Oberster, Alan C.'

Subject: FW: Former City Scrap - Connector Road

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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**From:** Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Friday, June 22, 2012 6:30 PM

**To:** Paul Gallagher **Cc:** Oberster, Alan C.

Subject: Re: Former City Scrap - Connector Road

paul, took a look at the info and offer the following observations.

- much of the cut-and-fill area for the connector road is outside of the restricted (fenced) area and does not require an action.
- the cut area within the restricted (fenced) area is not fully characterized for PCBs. the perimeter 7 samples have some detections both above and below 1 ppm and the 6 samples within the cut area all have detections below 1 ppm.
- EPA recommends that the eastern-half of the cut area within the restricted (fenced) area have a least 6 samples taken to confirm if PCB levels remain at <1 ppm at 0-2'.
- also, the western edge of the cut area adjacent to the new concrete pad should have at least 3 samples taken at 0-2' to see if PCB levels are >1ppm.
- based on these sample results, manage cut soils within the restricted (fenced) area accordingly.
  that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be
  managed onsite within the restricted (fenced) area if room is available or disposed of properly
  offsite if room is not available.</li>
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area
  to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that
  needs to be segregated and characterized to determine if it is appropriate fill material or should be
  properly disposed of offsite.

From: Paul Gallagher cpgallagher@sanbornhead.com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>

Date: 06/21/2012 04:11 PM

Subject: Former City Scrap - Connector Road

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

- 1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.
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- 3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P.

Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120910 Waste



Profile-Disposal UPDATED.PDF" deleted by Kenneth Bardo/R5/USEPA/US] 20121004-EPA Figure 2-2.pdf



# Fw: Status Update - Supplemental PCB Cleanup at Former City Scrap &

Salvage

Kenneth Bardo to: Peter Ramanauskas 10/09/2012 04:42 PM

From: Kenneth Bardo/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA,

History: This message has been replied to.

fyi

---- Forwarded by Kenneth Bardo/R5/USEPA/US on 10/09/2012 04:42 PM -----

From: Paul Gallagher <pgallagher@sanbornhead.com>

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Date: 10/09/2012 04:40 PM

Subject: RE: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

#### Hi Ken:

Yes. We collected additional soil samples at the end of the last week. We should receive analytical results for those soil samples tonight, and we made arrangement to excavate test pits for additional soils samples tomorrow. Please let me know if you have any questions about the on-going sampling or the remedial approach that we proposed.

Thanks for assistance.

**Paul** 

--

Paul P. Gallagher, P.G., C.P.

**Project Director** 

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**From:** Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Tuesday, October 09, 2012 11:13 AM

To: Paul Gallagher

Cc: Oberster, Alan C.; Knott, Charles J.

Subject: Re: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

paul, i am running this through our TSCA expert and hope to get back to you soon. will you continue to delineate the area to the east that is >1ppm PCB to determine the extent of the property that would need to be part of the new deed restriction? ken

Paul Gallagher ---10/05/2012 09:44:40 AM---Hi Ken, This message includes our proposed approach to complete the supplemental PCB cleanup at the

From: Paul Gallagher <pgallagher@sanbornhead.com>

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Date: 10/05/2012 09:44 AM

Subject: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

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We can provide additional details once you have had a chance to review the data and considered the above approach.

Thank you for your assistance, and please contact me if you have any comments or suggestions.

Regards,

Paul

Paul P. Gallagher, P.G., C.P. Project Director

Project Director

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**Sent:** Thursday, September 13, 2012 5:34 PM

**To:** Paul Gallagher

Subject: Re: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

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Date: 09/10/2012 04:45 PM

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Please contact me if you have any questions or comments.

Paul

Paul P. Gallagher, P.G., C.P. Project Director

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From: Paul Gallagher

Sent: Wednesday, August 29, 2012 3:00 PM

To: 'Kenneth Bardo'

Cc: Oberster, Alan C.; 'Knott, Charles J.'

Subject:

#### Hi Ken:

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- 3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
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Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday, we will begin the excavation activities once disposal arrangements are finalized.

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report. Please contact me if you have any questions or comments. Thank you for your assistance.

**Paul** 

Paul P. Gallagher, P.G., C.P. Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 12:41 PM

To: Paul Gallagher

**Cc:** Oberster, Alan C.; Knott, Charles J.

Subject: Re: FW: Former City Scrap - Connector Road

Paul, EPA has reviewed your letter of August 16th providing the *Supplemental PCB Assessment and Soil Management and Disposal Plan* for TSB Metals and Recycling, LLC located at 611 Wilbeth Road in Akron, Ohio. EPA provides the following comments:

- Explain why borings B618 and B619 were not sampled and analyzed.
- Sheet No. 2 of 3, Exhibit A reports PCB levels at 0 to 1 feet at B616 at <11.5 ppm. Has this data been validated and accepted? This detection limit is too high to confirm that PCBs are not present above cleanup levels. Conduct additional sampling to confirm PCB levels at this location.
- In the summary report, provide final verification results showing that Areas B, C, and D have been adequately remediated (i.e., PCBs <1 ppm). Also provide the completed manifests for disposal of approximately 900 cubic yards of PCB contaminated soil at the American Landfill in Waynesburg, Ohio.
- Ensure that the cut and fill activities associated with the proposed connector road do not impinge
  within the proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507,
  B508, B608). Consider erecting the proposed relocated fence in this area before road
  construction activities to delineate the area not to be disturbed.

From: Paul Gallagher < pgallagher@sanbornhead.com >

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Knott, Charles J." <<u>charles.knott@timken.com</u>>, "Oberster, Alan C." <<u>alan.oberster@timken.com</u>>

Date: 08/16/2012 08:22 AM

Subject: FW: Former City Scrap - Connector Road

#### Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

#### Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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From: Paul Gallagher

**Sent:** Wednesday, July 11, 2012 12:15 PM

**To:** 'Kenneth Bardo' **Cc:** 'Oberster, Alan C.'

Subject: FW: Former City Scrap - Connector Road

Hi Ken:

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The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

Paul P. Gallagher, P.G., C.P. Project Director

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**From:** Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Friday, June 22, 2012 6:30 PM

**To:** Paul Gallagher **Cc:** Oberster, Alan C.

Subject: Re: Former City Scrap - Connector Road

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- much of the cut-and-fill area for the connector road is outside of the restricted (fenced) area and does not require an action.
- the cut area within the restricted (fenced) area is not fully characterized for PCBs. the perimeter 7 samples have some detections both above and below 1 ppm and the 6 samples within the cut area all have detections below 1 ppm.
- EPA recommends that the eastern-half of the cut area within the restricted (fenced) area have a least 6 samples taken to confirm if PCB levels remain at <1 ppm at 0-2'.
- also, the western edge of the cut area adjacent to the new concrete pad should have at least 3 samples taken at 0-2' to see if PCB levels are >1ppm.
- based on these sample results, manage cut soils within the restricted (fenced) area accordingly.
  that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be
  managed onsite within the restricted (fenced) area if room is available or disposed of properly
  offsite if room is not available.</li>
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area
  to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that
  needs to be segregated and characterized to determine if it is appropriate fill material or should be
  properly disposed of offsite.

From: Paul Gallagher com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>

Date: 06/21/2012 04:11 PM

Subject: Former City Scrap - Connector Road

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.

- 2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations of PCBs greater than 1 ppm, so they will need to be managed appropriately.
- 3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120910\_Waste Profile-Disposal UPDATED.PDF" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20121004-EPA Figure 2-2.pdf" deleted by Kenneth Bardo/R5/USEPA/US]



Re: Fw: Status Update - Supplemental PCB Cleanup at Former City Scrap &

Salvage 🗎

Peter Ramanauskas to: Kenneth Bardo

10/09/2012 05:08 PM

From: Peter Ramanauskas/R5/USEPA/US
To: Kenneth Bardo/R5/USEPA/US,

Thanks, Ken. I'd like to see what the new data shows, but so far the only thing I have questions on is the proposed "relocation" of soil between 1 and 25. How do they propose to "manage and reuse" this material under the low-occupancy conditions?

#### Pete

Kenneth Bardo fyi ----- Forwarded by Kenneth Bardo/R5/USEPA... 10/09/2012 04:42:38 PM

From: Kenneth Bardo/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA,

Date: 10/09/2012 04:42 PM

Subject: Fw: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

fyi

----- Forwarded by Kenneth Bardo/R5/USEPA/US on 10/09/2012 04:42 PM -----

From: Paul Gallagher <pgallagher@sanbornhead.com>

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Date: 10/09/2012 04:40 PM

Subject: RE: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

#### Hi Ken:

Yes. We collected additional soil samples at the end of the last week. We should receive analytical results for those soil samples tonight, and we made arrangement to excavate test pits for additional soils samples tomorrow. Please let me know if you have any questions about the on-going sampling or the remedial approach that we proposed.

Thanks for assistance.

#### Paul

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Paul P. Gallagher, P.G., C.P.

**Project Director** 

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**From:** Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Tuesday, October 09, 2012 11:13 AM

To: Paul Gallagher

**Cc:** Oberster, Alan C.; Knott, Charles J.

Subject: Re: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

paul, i am running this through our TSCA expert and hope to get back to you soon. will you continue to delineate the area to the east that is >1ppm PCB to determine the extent of the property that would need to be part of the new deed restriction? ken

Paul Gallagher ---10/05/2012 09:44:40 AM---Hi Ken, This message includes our proposed approach to complete the supplemental PCB cleanup at the

From: Paul Gallagher cpgallagher@sanbornhead.com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <a href="mailto:alan.oberster@timken.com">alan.oberster@timken.com</a>>, "Knott, Charles J." <a href="mailto:charles.knott@timken.com">charles.knott@timken.com</a>>

Date: 10/05/2012 09:44 AM

Subject: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

# Hi Ken,

This message includes our proposed approach to complete the supplemental PCB cleanup at the TSB Metal Recycling (TSB) property in Akron, Ohio. The attached figure depicts the status of the supplemental PCB cleanup, which is being performed to support the pending construction of a road by the City of Akron. To date, TSB has excavated and disposed of approximately 1,500 tons of soil, and the latest verification results suggest that the current approach to remove and dispose the residual PCB contaminated soils in the vicinity of the road is not viable.

The deed restriction for the original PCB cleanup by City Scrap and Salvage Co. (City Scrap) limits land use to industrial and commercial only, and requires that the property be secured by a fence. When City Scrap completed the original PCB cleanup, their perimeter fence secured the central and western portions of the property. The limited data obtained outside of the fenced area when the original PCB cleanup was completed indicated that PCB contamination did not extend beyond the fenced area.

Since the proposed road extends through the current fenced area, the supplemental PCB cleanup completed to date has focused on removing residual PCB contamination within the eastern-most portion of the fenced area. However, as shown on the attached figure, the recent analytical results indicate that the distribution of PCBs in soils extends beyond the current fenced area, into the eastern portion of the property. Based on our updated understanding of the distribution of residual PCB contamination at the property, it's no longer economically feasible to continue the current supplemental PCB cleanup approach.

We recommend for your consideration the following modified approach, which is based on the standard cleanup levels for a self-implementing PCB cleanup (40 CFR §761.61(a)(8)):

- Rather than constraining the supplemental PCB cleanup approach to manage soils based on the location of the existing fence area, the deed restriction will require: 1) a relocated fence to secure the metal recycling operations as described in the Soil Handling and Management Plan dated August 2012, and 2) high occupancy use will be prohibited in the area to the east of the relocated fenced area, where the proposed driveway and road will be built. Prohibiting high-occupancy use is consistent with the requirements for a cleanup under the self-implementing cleanup rules.
- Based on the self-implementing cleanup requirements for bulk remediation waste with low occupancy use, the remaining active cleanup activities to the east of the relocated fence will focus on the removal and off-site disposal of soils with residual PCB concentrations greater than 25 ppm (i.e., in the vicinity of test pit "f"). Post-excavation sampling will be performed to verify the removal of residual PCB contamination at concentrations greater than 25 ppm.
- During construction of the road, the soils located outside of the relocated fenced area with residual PCB concentrations between 1 ppm and 25 ppm will be managed and reused within the low-occupancy area. Please note that the proposed road grade extends more than 13 feet below the current ground surface elevation, and soils with PCB concentrations greater than 1 ppm will not be used as fill within the right-of-way for the road.

We can provide additional details once you have had a chance to review the data and considered the above approach.

Thank you for your assistance, and please contact me if you have any comments or suggestions.

Regards,

Paul

Paul P. Gallagher, P.G., C.P. Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Thursday, September 13, 2012 5:34 PM

To: Paul Gallagher

**Subject:** Re: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

paul, thanks for the updated figure depicting the areas of excavation for the PCB cleanup at the TSB Metals site. EPA comments on the August 16 workplan have been addressed. the work may proceed. please provide a summary report when the work is complete, including verification sampling and manifests for wastes disposed at the two landfills. ken

Paul Gallagher ---09/10/2012 04:45:58 PM---Hi Ken: The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesd

From: Paul Gallagher com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>

Date: 09/10/2012 04:45 PM

Subject: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

#### Hi Ken:

The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesday. This message includes an updated soil excavation plan, which also summarizes the soil disposal program. Non-hazardous soil will be disposed of at Countywide Landfill, and hazardous waste soil (based on TCLP lead results for each excavation area) will be disposed of at Envirite of Ohio. In accordance with the Supplemental PCB Assessment and Soil Management and Disposal Plan , post-excavation sampling will be conducted at Areas B through E.

Please contact me if you have any questions or comments.

Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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From: Paul Gallagher

Sent: Wednesday, August 29, 2012 3:00 PM

To: 'Kenneth Bardo'

Cc: Oberster, Alan C.; 'Knott, Charles J.'

## Subject:

Hi Ken:

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

- 1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.
  2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.
- 3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
- 4) Arrangements are being made to install the fence before the road construction activities begin .

Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday , we will begin the excavation activities once disposal arrangements are finalized .

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report. Please contact me if you have any questions or comments. Thank you for your assistance.

Paul		
Paul P. Gallagher, P.G., C.P.		
Project Director		
J		

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Sent: Wednesday, August 22, 2012 12:41 PM

**To:** Paul Gallagher

Cc: Oberster, Alan C.; Knott, Charles J.

Subject: Re: FW: Former City Scrap - Connector Road

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• Explain why borings B618 and B619 were not sampled and analyzed.

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To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Knott, Charles J." <<u>charles.knott@timken.com</u>>, "Oberster, Alan C." <<u>alan.oberster@timken.com</u>>

Date: 08/16/2012 08:22 AM

Subject: FW: Former City Scrap - Connector Road

## Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul

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Paul P. Gallagher, P.G., C.P.

Project Director

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From: Paul Gallagher

Sent: Wednesday, July 11, 2012 12:15 PM

**To:** 'Kenneth Bardo' **Cc:** 'Oberster, Alan C.'

Subject: FW: Former City Scrap - Connector Road

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Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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**Sent:** Friday, June 22, 2012 6:30 PM

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Subject: Re: Former City Scrap - Connector Road

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From: Paul Gallagher cpgallagher@sanbornhead.com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>

Date: 06/21/2012 04:11 PM

Subject: Former City Scrap - Connector Road

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issues that we have identified regarding the proposed connector road through the western portion of the site:

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Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P. Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120910\_Waste Profile-Disposal UPDATED.PDF" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20121004-EPA Figure 2-2.pdf" deleted by Kenneth Bardo/R5/USEPA/US]



# Fw: Status Update - Supplemental PCB Cleanup at Former City Scrap &

Salvage

Kenneth Bardo to: Peter Ramanauskas

10/18/2012 03:41 PM

From: Kenneth Bardo/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA,

pete - i am going to try to talk to them early next week so if you have any suggestions ...

----- Forwarded by Kenneth Bardo/R5/USEPA/US on 10/18/2012 03:39 PM -----

From: Paul Gallagher <pgallagher@sanbornhead.com>

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Date: 10/18/2012 11:38 AM

Subject: RE: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

#### Hi Ken:

The attached Figure 1 summarizes the new and historical analytical results for soil samples located in the proposed "low-occupancy" area, and Figure 2 shows the "cut" and "fill" areas for the proposed road. This message includes a brief description of how we propose to manage and reuse soils with PCB concentrations between 1 and 25 ppm.

In general, the soils with new data are located in the "cut" area, and the road cut will extend down to about 13 feet below the current grade. Before earthwork for the road would begin, the soils with PCB concentrations greater than 25 ppm (i.e., test pit "f" and "k") would be excavated and disposed of off-site at a landfill. The residual PCB contamination (i.e., between 1 and 25 ppm) would be moved during the earthwork to the adjacent "fill area." A deed restriction would identify that soils have PCB concentrations less than 25 ppm and that high-occupancy land use is prohibited in the eastern portion of TSB's property.

Can you provide a time when we can call you to discuss the status of the project and our proposed approach?

Best regards,

Paul

--

Paul P. Gallagher, P.G., C.P.

Project Director

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From: Bardo.Kenneth@epamail.epa.gov [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Wednesday, October 10, 2012 11:41 AM

**To:** Paul Gallagher

Subject: RE: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

We would like to see what the new data shows. Are only question right now is on the proposed "relocation" of soil between 1 and 25 ppm. How do you propose to "manage and reuse" this material under the low-occupancy conditions?

-----Paul Gallagher com wrote: -----

To: Kenneth Bardo/R5/USEPA/US@EPA

From: Paul Gallagher < pgallagher@sanbornhead.com >

Date: 10/09/2012 04:40PM

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <

charles.knott@timken.com>

Subject: RE: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

Hi Ken:

Yes. We collected additional soil samples at the end of the last week. We should receive analytical results for those soil samples tonight, and we made arrangement to excavate test pits for additional soils samples tomorrow. Please let me know if you have any questions about the on-going sampling or the remedial approach that we proposed.

Thanks for assistance.

Paul

--

Paul P. Gallagher, P.G., C.P.

Project Director

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**From:** Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Tuesday, October 09, 2012 11:13 AM

To: Paul Gallagher

Cc: Oberster, Alan C.; Knott, Charles J.

Subject: Re: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

paul, i am running this through our TSCA expert and hope to get back to you soon. will you continue to delineate the area to the east that is >1ppm PCB to determine the extent of the property that would need to be part of the new deed restriction? ken

Paul Gallagher ---10/05/2012 09:44:40 AM---Hi Ken, This message includes our proposed approach to complete the supplemental PCB cleanup at the

From: Paul Gallagher cpgallagher@sanbornhead.com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Date: 10/05/2012 09:44 AM

Subject: Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage

## Hi Ken,

This message includes our proposed approach to complete the supplemental PCB cleanup at the TSB Metal Recycling (TSB) property in Akron, Ohio. The attached figure depicts the status of the supplemental PCB cleanup, which is being performed to support the pending construction of a road by the City of Akron. To date, TSB has excavated and disposed of approximately 1,500 tons of soil, and the latest verification results suggest that the current approach to remove and dispose the residual PCB contaminated soils in the vicinity of the road is not viable.

The deed restriction for the original PCB cleanup by City Scrap and Salvage Co. (City Scrap) limits land use to industrial and commercial only, and requires that the property be secured by a fence. When City Scrap completed the original PCB cleanup, their perimeter fence secured the central and western portions of the property. The limited data obtained outside of the fenced area when the original PCB cleanup was completed indicated that PCB contamination did not extend beyond the fenced area.

Since the proposed road extends through the current fenced area, the supplemental PCB cleanup completed to date has focused on removing residual PCB contamination within the eastern-most portion of the fenced area. However, as shown on the attached figure, the recent analytical results indicate that the distribution of PCBs in soils extends beyond the current fenced area, into the eastern portion of the property. Based on our updated understanding of the distribution of residual PCB contamination at the property, it's no longer economically feasible to continue the current supplemental PCB cleanup approach.

We recommend for your consideration the following modified approach, which is based on the standard cleanup levels for a self-implementing PCB cleanup (40 CFR §761.61(a)(8)):

• Rather than constraining the supplemental PCB cleanup approach to manage soils based on the location of the existing fence area, the deed restriction will require: 1) a relocated fence to secure the metal recycling operations as described in the Soil Handling and Management Plan dated August 2012, and 2) high occupancy use will be prohibited in the

area to the east of the relocated fenced area, where the proposed driveway and road will be built. Prohibiting high-occupancy use is consistent with the requirements for a cleanup under the self-implementing cleanup rules.

- Based on the self-implementing cleanup requirements for bulk remediation waste with low occupancy use, the remaining active cleanup activities to the east of the relocated fence will focus on the removal and off-site disposal of soils with residual PCB concentrations greater than 25 ppm (i.e., in the vicinity of test pit "f"). Post-excavation sampling will be performed to verify the removal of residual PCB contamination at concentrations greater than 25 ppm.
- During construction of the road, the soils located outside of the relocated fenced area with residual PCB concentrations between 1 ppm and 25 ppm will be managed and reused within the low-occupancy area. Please note that the proposed road grade extends more than 13 feet below the current ground surface elevation, and soils with PCB concentrations greater than 1 ppm will not be used as fill within the right-of-way for the road.

We can provide additional details once you have had a chance to review the data and considered the above approach.

Thank you for your assistance, and please contact me if you have any comments or suggestions.

Regards,

Paul

Paul P. Gallagher, P.G., C.P. Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Thursday, September 13, 2012 5:34 PM

To: Paul Gallagher

**Subject:** Re: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

paul, thanks for the updated figure depicting the areas of excavation for the PCB cleanup at the TSB Metals site. EPA comments on the August 16 workplan have been addressed. the work may proceed.

please provide a summary report when the work is complete, including verification sampling and manifests for wastes disposed at the two landfills. ken

Paul Gallagher ---09/10/2012 04:45:58 PM---Hi Ken: The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesd

Date: 09/10/2012 04:45 PM

Subject: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

#### Hi Ken:

The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesday. This message includes an updated soil excavation plan, which also summarizes the soil disposal program. Non-hazardous soil will be disposed of at Countywide Landfill, and hazardous waste soil (based on TCLP lead results for each excavation area) will be disposed of at Envirite of Ohio. In accordance with the Supplemental PCB Assessment and Soil Management and Disposal Plan , post-excavation sampling will be conducted at Areas B through E.

Please contact me if you have any questions or comments.

Paul

\_-

Paul P. Gallagher, P.G., C.P. Project Director

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From: Paul Gallagher

Sent: Wednesday, August 29, 2012 3:00 PM

To: 'Kenneth Bardo'

Cc: Oberster, Alan C.; 'Knott, Charles J.'

Subject:

#### Hi Ken:

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon

investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.

2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.

- 3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
- 4) Arrangements are being made to install the fence before the road construction activities begin.

Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday, we will begin the excavation activities once disposal arrangements are finalized.

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report. Please contact me if you have any questions or comments. Thank you for your assistance.

**Paul** 

Paul P. Gallagher, P.G., C.P. Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 12:41 PM

To: Paul Gallagher

Cc: Oberster, Alan C.; Knott, Charles J.

Subject: Re: FW: Former City Scrap - Connector Road

Paul, EPA has reviewed your letter of August 16th providing the *Supplemental PCB Assessment and Soil Management and Disposal Plan* for TSB Metals and Recycling, LLC located at 611 Wilbeth Road in Akron, Ohio. EPA provides the following comments:

Explain why borings B618 and B619 were not sampled and analyzed.

- Sheet No. 2 of 3, Exhibit A reports PCB levels at 0 to 1 feet at B616 at <11.5 ppm. Has this data been validated and accepted? This detection limit is too high to confirm that PCBs are not present above cleanup levels. Conduct additional sampling to confirm PCB levels at this location.
- In the summary report, provide final verification results showing that Areas B, C, and D have been
  adequately remediated (i.e., PCBs <1 ppm). Also provide the completed manifests for disposal of
  approximately 900 cubic yards of PCB contaminated soil at the American Landfill in Waynesburg,
  Ohio.</li>
- Ensure that the cut and fill activities associated with the proposed connector road do not impinge
  within the proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507,
  B508, B608). Consider erecting the proposed relocated fence in this area before road
  construction activities to delineate the area not to be disturbed.

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Knott, Charles J." < charles.knott@timken.com >, "Oberster, Alan C." < alan.oberster@timken.com >

Date: 08/16/2012 08:22 AM

Subject: FW: Former City Scrap - Connector Road

## Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

#### Paul

Paul P. Gallagher, P.G., C.P. Project Director

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From: Paul Gallagher

**Sent:** Wednesday, July 11, 2012 12:15 PM

**To:** 'Kenneth Bardo' **Cc:** 'Oberster, Alan C.'

Subject: FW: Former City Scrap - Connector Road

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

Paul P. Gallagher, P.G., C.P. Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]

**Sent:** Friday, June 22, 2012 6:30 PM

**To:** Paul Gallagher **Cc:** Oberster, Alan C.

Subject: Re: Former City Scrap - Connector Road

paul, took a look at the info and offer the following observations.

- much of the cut-and-fill area for the connector road is outside of the restricted (fenced) area and does not require an action.
- the cut area within the restricted (fenced) area is not fully characterized for PCBs. the perimeter 7 samples have some detections both above and below 1 ppm and the 6 samples within the cut area all have detections below 1 ppm.
- EPA recommends that the eastern-half of the cut area within the restricted (fenced) area have a least 6 samples taken to confirm if PCB levels remain at <1 ppm at 0-2'.
- also, the western edge of the cut area adjacent to the new concrete pad should have at least 3 samples taken at 0-2' to see if PCB levels are >1ppm.
- based on these sample results, manage cut soils within the restricted (fenced) area accordingly.
  that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be
  managed onsite within the restricted (fenced) area if room is available or disposed of properly
  offsite if room is not available.</li>
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area
  to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that
  needs to be segregated and characterized to determine if it is appropriate fill material or should be
  properly disposed of offsite.

From: Paul Gallagher com

To: Kenneth Bardo/R5/USEPA/US@EPA

Cc: "Oberster, Alan C." <a href="mailto:alan.oberster@timken.com">alan.oberster@timken.com</a>>

Date: 06/21/2012 04:11 PM

Subject: Former City Scrap - Connector Road

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

- 1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.
- 2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations

of PCBs greater than 1 ppm, so they will need to be managed appropriately.

3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

--

Paul P. Gallagher, P.G., C.P.

Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120910\_Waste Profile-Disposal UPDATED.PDF" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20121004-EPA Figure





2-2.pdf" deleted by Kenneth Bardo/R5/USEPA/US] 20121018-CleanUp-Status.pdf 20121018-Cut-Fill fig 2-2.pdf



# Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

Cooke, Henry to: Peter Ramanauskas, Kenneth Bardo 01/17/2013 02:48 PM "Katz, Steven M.", "Katz, Randy S.", "akatz1970@neo.rr.com",

Project Email Hold

From: "Cooke, Henry" < hpcooke@craworld.com>

To: Peter Ramanauskas/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA, Cc: "Katz, Steven M." <katzs@timken.com>, "Katz, Randy S." <katzr@timken.com>,

"akatz1970@neo.rr.com" <akatz1970@neo.rr.com>, Project Email Hold

<filing@craworld.com>

History: This message has been forwarded.

## Peter;

Attached please find additional information concerning the soil stockpiles at the Former City Scrap & Salvage site in Akron, Ohio. The information in this letter should be considered in conjunction with our letter dated January 11, 2013.

We look forward to hearing from you.

Henry Cooke Conestoga-Rovers & Associates Inc. 9033 Meridian Way West Chester, Ohio 45069 (513) 942-4750 (p) (513) 942-8585 (f) (513) 200-8905 (c)



077241RAMA-02 (2)-Final.pdf



# Fw: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

Kenneth Bardo to: Peter Ramanauskas

01/17/2013 03:53 PM

From: Kenneth Bardo/R5/USEPA/US

To: Peter Ramanauskas/R5/USEPA/US@EPA,

pete, would have been nice if they submitted this before. if you look at the data however, they typically sampled only 0 - 2'.

there were two distinct sampling events B101 - 118 in June 2008 and B201 - 279 in July 2008. only took deeper subsurface at B101 to B104 (at 6.5 - 7.5'). these were all relatively clean samples. also took 2-3' or 2-4' sample at B211, B213, and B225.

For borings with highest PCB concentrations at 0-2', only surface samples were taken (see B113, 115, 212, 221, 274). So i'm not sure that the deeper subsurface, which they excavated, was properly characterized. Plus they are relying on third party data (potential purchaser Timken) who did not buy the property. Seems like City Scrap should have characterized the subsurface better before they started digging. From the google photo, looks like the excavations were deeper than 2'. ken

## ---- Forwarded by Kenneth Bardo/R5/USEPA/US on 01/17/2013 03:39 PM -----

From: "Cooke, Henry" < hpcooke@craworld.com>

To: Peter Ramanauskas/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Katz, Steven M." <katzs@timken.com>, "Katz, Randy S." <katzr@timken.com>,

"akatz1970@neo.rr.com" <akatz1970@neo.rr.com>, Project Email Hold <filing@craworld.com>

Date: 01/17/2013 02:49 PM

Subject: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

#### Peter;

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We look forward to hearing from you.

Henry Cooke Conestoga-Rovers & Associates Inc. 9033 Meridian Way West Chester, Ohio 45069 (513) 942-4750 (p) (513) 942-8585 (f) (513) 200-8905 (c)

[attachment "077241RAMA-02 (2)-Final.pdf" deleted by Kenneth Bardo/R5/USEPA/US]



# Fw: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

Peter Ramanauskas to: Kenneth Zolnierczyk 01/22/2013 01:59 PM

From: Peter Ramanauskas/R5/USEPA/US
To: Kenneth Zolnierczyk/R5/USEPA/US,

## ----- Forwarded by Peter Ramanauskas/R5/USEPA/US on 01/22/2013 01:58 PM -----

From: "Cooke, Henry" < hpcooke@craworld.com>

To: Peter Ramanauskas/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA, Cc: "Katz, Steven M." <katzs@timken.com>, "Katz, Randy S." <katzr@timken.com>,

"akatz1970@neo.rr.com" <akatz1970@neo.rr.com>, Project Email Hold <filing@craworld.com>

Date: 01/17/2013 02:48 PM

Subject: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

## Peter;

Attached please find additional information concerning the soil stockpiles at the Former City Scrap & Salvage site in Akron, Ohio. The information in this letter should be considered in conjunction with our letter dated January 11, 2013.

We look forward to hearing from you.

Henry Cooke Conestoga-Rovers & Associates Inc. 9033 Meridian Way West Chester, Ohio 45069 (513) 942-4750 (p) (513) 942-8585 (f)

(513) 200-8905 (c)

077241RAMA-02 (2)-Final.pdf